

process and technical assistance that offers competing carriers a meaningful opportunity to compete.”<sup>149</sup>

In reaching these conclusions, the FCC uses two tests. First, for OSS functions that are analogous to those that Verizon provides to itself, its customers or affiliates, the FCC indicated that the non-discrimination standard would be met by Verizon showing that it offers the requesting carrier access that is equivalent in terms of quality, accuracy and timeliness. In other words, Verizon permits CLECs to perform these functions in “substantially the same time and manner.”<sup>150</sup> Second, for OSS functions that have no retail analogues, the FCC found that Verizon would meet the requirements if it offers access “sufficient to allow an efficient competitor a meaningful opportunity to compete.”<sup>151</sup> In this area, the FCC noted the importance of specific performance standards for measuring OSS performance either “adopted by the relevant state commission or agreed upon by the BOC in an interconnection agreement or during the implementation of such an agreement.”<sup>152</sup>

## **8. VZ-RI’s Position – OSS Analysis**

### **A. Overall OSS Compliance with the Act**

VZ-RI has asserted that the interfaces, gateway systems, and the underlying OSS for pre-ordering, ordering, provisioning, maintenance and repair and billing that Verizon New England (“VZ-NE”) provides to CLECs in Rhode Island are the same ones serving Massachusetts. VZ-RI stated that VZ-NE’s OSS are presently handling actual commercial volumes of CLEC transactions in Rhode Island with excellent performance.

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<sup>149</sup> New York Order, ¶ 82.

<sup>150</sup> Id. at ¶ 85.

<sup>151</sup> Id. at ¶ 86.

<sup>152</sup> Id.

In addition to this real world proof of commercial performance, VZ-RI noted that VZ-NE's interfaces, support systems, and processes have been subjected to a thorough and comprehensive third-party testing in Massachusetts and passed this third-party test. KPMG has now conducted additional tests in Rhode Island to confirm the sameness of those systems and processes in Rhode Island and Massachusetts and has examined specific additional areas requested by the RIPUC that were not covered in the Massachusetts test. VZ-RI noted that it also passed these tests. VZ-RI noted that, based on its evaluation, KPMG found that "[i]n totality, these results lead KPMG Consulting to believe that were we to have conducted a full-scale OSS evaluation on the magnitude of the Massachusetts test, Verizon Rhode Island would have demonstrated equivalent or superior results."<sup>153</sup>

VZ-RI noted that few claims of OSS performance failures were raised during the course of the Rhode Island 271 proceeding. According to VZ-RI, of those claims made, most were isolated incidents that have been addressed. VZ-RI maintained that its handling of actual commercial transactions and the extensive testing of its interfaces, support systems, and processes, demonstrate that VZ-RI provides CLECs in Rhode Island with non-discriminatory access to its OSS, allowing them to offer local service in substantially the same time and manner as VZ-RI and a meaningful opportunity to compete as required by the FCC.<sup>154</sup>

VZ-RI pointed out that the FCC has concluded that Verizon had met its OSS obligations in New York and Massachusetts – the latter as recently as April of 2001.<sup>155</sup> VZ-RI noted that in both instances, the FCC based its conclusions on a review of the

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<sup>153</sup> Verizon's Post-Hearing Brief, p. 175-76, citing KPMG RI Report, p. 13.

<sup>154</sup> Verizon's Post-Hearing Brief, p. 176.

evidence presented by Verizon and other parties, on the performance results reported in Verizon's C2C Performance Reports for the respective states, on the independent third-party reports of KPMG relating the findings from its lengthy and comprehensive tests of Verizon's OSS in New York and Massachusetts, and on the favorable recommendations of the NYPSC and the Massachusetts DTE. VZ-RI further noted that the FCC has specifically declared that its conclusions are based on "the totality of the evidence," rather than any specific individual aspect of Verizon's service to CLECs in the respective states.<sup>156</sup>

VZ-RI asserted that its OSS in Rhode Island are the same as those employed in Massachusetts.<sup>157</sup> Furthermore, VZ-RI maintained that its conclusion is underscored by the results of the KPMG testing conducted for Rhode Island.<sup>158</sup>

### **B. Independent Third-Party Testing**

The FCC has given great weight to the results of the thorough third-party testing conducted in assessing Verizon's OSS compliance with the Act in New York and Massachusetts.<sup>159</sup> VZ-RI noted that the FCC has also explicitly endorsed the use of evidence from related jurisdictions to demonstrate compliance with the Act.<sup>160</sup>

VZ-RI stated that the common VZ-NE OSS and interfaces have already been subject to a comprehensive third-party evaluation by KPMG and Hewlett-Packard Consulting ("HPC") in Massachusetts, under the guidance and oversight of the

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<sup>155</sup> Id. at 121; See Massachusetts Order, ¶¶ 43-49.

<sup>156</sup> Id. at 121; See New York Order, ¶ 82.

<sup>157</sup> See, e.g., Verizon RI 271 Filing - OSS Declaration, ¶¶ 16, 20-22, and associated detailed comparison Tables 1 and 2.

<sup>158</sup> Verizon's Post-Hearing Brief, p. 121.

<sup>159</sup> Id. at 122, citing New York Order, ¶¶ 10, 96-100; Massachusetts Order, ¶¶ 44-49.

<sup>160</sup> Verizon's Post-Hearing Brief, p. 122, noting that on January 22, 2001, the FCC approved SBC's 271 request for the Provisioning of In-Region, InterLATA Services in Kansas and Oklahoma. In reaching its conclusion that SBC had demonstrated that it provides non-discriminatory access to its OSS, the FCC

Massachusetts DTE. VZ-RI explained that KPMG designed the Massachusetts test to address all stages of a CLEC's relationship with VZ-NE, including the initial establishment of the relationship, daily operations, and the ongoing relationship. KPMG included each of the potential service delivery methods a CLEC might use – resale, unbundled network elements, unbundled network element platforms, and other combinations of unbundled network elements – in its test. In conclusion, VZ-RI emphasized that the KPMG review found an outstanding level of VZ-NE achievement and the FCC concluded that this KPMG testing and results provided “persuasive evidence of Bell Atlantic’s OSS readiness.”<sup>161</sup>

VZ-RI asserted that the OSS systems, interfaces, documentation, policies and procedures are the same in Rhode Island and Massachusetts.<sup>162</sup> Therefore, VZ-RI maintained that the results achieved in the Massachusetts test are directly applicable to Rhode Island as well. VZ-RI asserted that in its Kansas/Oklahoma Order, the FCC noted the importance of regional OSS systems in the evaluation of OSS for a state within the regional system.<sup>163</sup>

VZ-RI explained that there were two dimensions to KPMG’s evaluation of VZ-NE’s OSS in Rhode Island: a “sameness” review and three separate standalone tests of specific performance areas. According to VZ-RI, the tests in both of these areas were successful.<sup>164</sup>

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relied on the detailed evidence SBC provided about its service in these states and, in certain instances, the FCC’s prior findings in the Texas Order. *Id.*, citing Kansas/Oklahoma Order, ¶ 106.

<sup>161</sup> Verizon’s Post-Hearing Brief, p. 122, citing Massachusetts Order, ¶ 146.

<sup>162</sup> Verizon’s Post-Hearing Brief, p. 122; See Verizon RI 271 Filing – OSS Declaration, ¶¶20-21.

<sup>163</sup> Verizon’s Post-Hearing Brief, pp. 122-23 citing Kansas/Oklahoma Order, ¶ 108. In that Order, the FCC stated: “We conclude that SWBT, through the Ernst & Young report and other aspects of its application, provides reliable evidence that the OSS systems in Texas are relevant and should be considered in our evaluation of SWBT’s OSS in Kansas and Oklahoma.” Kansas/Oklahoma Order, at ¶ 108.

<sup>164</sup> Verizon’s Post-Hearing Brief, p. 123, citing KPMG RI Report.

## 1. KPMG “Sameness” Testing

VZ-RI indicated that under the direction of the RIPUC, KPMG conducted a comprehensive assessment of the “sameness” of VZ-NE’s systems, interfaces and processes in Rhode Island and Massachusetts by comparing the OSS systems, interfaces and processes in Rhode Island with those evaluated in Massachusetts. As in the earlier Massachusetts test, KPMG’s review included all stages of the CLEC-ILEC relationship, including establishing the relationship, performing daily operations, and maintaining the relationship.<sup>165</sup> The KPMG review of VZ-NE’s OSS in Rhode Island utilized the KPMG test results in Massachusetts as a starting point and consisted of numerous independent analyses to reach conclusions concerning sameness. Again, each of the VZ-NE service delivery methods – resale, unbundled network elements, unbundled network element platforms, and combinations of unbundled network elements – are included in the scope of the review.<sup>166</sup>

VZ-RI explained that KPMG’s “sameness” test also addressed each of the OSS areas previously studied in Massachusetts: Preordering/Ordering/Provisioning; Maintenance and Repair; Billing, and Relationship Management Infrastructure. Further, it included a review of Performance Metrics Reporting. In each area, KPMG identified “operating elements” that provided the basis for its concluding sameness for a particular test target.<sup>167</sup> These individual elements included System or Interface, Process, Personnel, Facilities, Management Structure, and Performance Measures. VZ-RI pointed

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<sup>165</sup> Verizon’s Post-Hearing Brief, p. 124, citing KPMG RI Report, p. 6.

<sup>166</sup> Id.

<sup>167</sup> Id., citing KPMG RI Report, p. 10.

out that KPMG employed two fundamental types of tests, operational sameness tests and transaction-driven tests.<sup>168</sup>

KPMG categorized its findings into three categories, indicating that it did not expect the associated operating elements “to remain static over time.”<sup>169</sup> Accordingly, it assigned an observation to Category 1 where there was no change, or where changes “reflect typical business enhancements that are incremental in nature.”<sup>170</sup> Where KPMG had observed “substantial changes in one of the operating elements since the time of the Massachusetts test,” KPMG assigned an observation to either Category 2 or Category 3. VZ-RI emphasized that Category 2 was assigned only if KPMG also “determined that no material differences existed with regard to the associated functionality or roles and responsibilities from the time of the Massachusetts test.”<sup>171</sup> KPMG assigned the change to Category 3 if it observed “a material difference in functionality or roles and responsibilities.”<sup>172</sup>

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<sup>168</sup> Verizon’s Post-Hearing Brief, p. 124, citing KPMG RI Report, p. 7 and quoting Tr. 10/9/01, pp. 43-4. KPMG explained the validity of its testing at the hearing, stating:

[W]e designed a test that was slightly different than the test that KPMG Consulting has traditionally done because it was designed to look at whether or not the systems, processes et cetera, in Rhode Island were the same as those systems, processes, et cetera, that had provided the satisfactory result or the satisfied results that our report in Massachusetts produced, but it was also done with the almost “I’m from Missouri” approach because we really didn’t want to – there was a hypothesis that things were the same and we just didn’t want to accept on face value – any of that hypothesis.

[W]e built a test plan that included a lot of transactional testing so that the plan was very robust and only didn’t look and make sure that the systems and the processes and people were qualitatively the same. In other words, I went to the work center and it was the same work center, or I went out and it was the same person I interviewed when I was in Massachusetts, or if it wasn’t the same work center, they were using the same processes, same work structure and we supplemented this process with statistically significant testing in its own right to see if the outputs of those processes were the same for Rhode Island and Massachusetts.  
Tr. 10/9/01, at 43-44.

<sup>169</sup> Verizon’s Post-Hearing Brief, p. 125, citing KPMG RI Report, p. 10.

<sup>170</sup> Id. at 10.

<sup>171</sup> Id.

<sup>172</sup> Id.

VZ-RI characterized the majority of KPMG findings as falling into Category 1, with fewer falling into Category 2. VZ-RI noted that in only one case, Metrics Change Control, did KPMG find that a material change (Category 3) had occurred. VZ-RI emphasized that here, KPMG testified specifically that the change was an improvement to the process it observed in Massachusetts.<sup>173</sup>

KPMG also based its results on specific transaction testing of VZ-RI's performance in the areas of Preordering, Ordering, Provisioning and Billing. VZ-RI noted that KPMG determined that most evaluation measures showed "the results to be the same as those of the Massachusetts test."<sup>174</sup> VZ-RI asserted that in most cases where a difference was identified, the Rhode Island results were superior. VZ-RI pointed out that there were only three cases where the Rhode Island results were not clearly superior; however, in these cases, KPMG concluded that "the Rhode Island results would have satisfied the criterion in a stand-alone test."<sup>175</sup>

Based on both types of detailed analyses, VZ-RI noted that KPMG concluded that the Rhode Island test results confirm a high-degree of sameness between the operating elements as evaluated by KPMG during its test in Massachusetts and the operating elements as evaluated by KPMG during its test in Rhode Island across all five functional domains.<sup>176</sup>

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<sup>173</sup> Id., citing Tr. 10/9/01, at 66.

<sup>174</sup> Verizon's Post-Hearing Brief, p. 125, citing KPMG RI Report, p. 13.

<sup>175</sup> Verizon's Post-Hearing Brief, pp. 125-26, citing KPMG RI Report, p. 13, quoting Tr. 10/9/01, pp. 68-72.

<sup>176</sup> Verizon's Post-Hearing Brief, p. 126, citing KPMG RI Report, p. 13, in which KPMG stated: KPMG Consulting evaluated 786 test targets to confirm the degree of operational sameness between the two jurisdictions. Only in a single area, Metrics Change Management, did we conclude that there existed material differences in the operating elements of a sub-process. It is important to note that these observed differences reflected enhancements to the process evaluated during the Massachusetts test.

## 2. Stand-alone Testing

VZ-RI pointed out that at the direction of the RIPUC, KPMG also conducted stand-alone testing on three items that were not included in the Massachusetts test: Line Sharing, Line Loss Reports and Electronic Jeopardies. KPMG concluded that VZ-RI received a “Satisfied” result in its testing on Line Sharing (Test POP 4-3-2) and the Line Loss Report testing (Test POP 4-3-1).<sup>177</sup>

In the other test area, Electronic Jeopardies (Test POP 1-17-1, -2, and -3), KPMG assigned an “inconclusive” finding because of “the limitations associated with attempts to ‘force’ electronic jeopardies.”<sup>178</sup> VZ-RI emphasized that the test results were inconclusive because KPMG could not identify enough orders in Rhode Island that were in jeopardy – since VZ-RI’s on-time order provisioning exceeded 98%.<sup>179</sup> Thus, there was no operational need for the jeopardy report at all. VZ-RI noted that KPMG stated, “there’s not a huge number of orders, and the vast majority of those are provisioned on time, so the opportunity to see a jeopardy notice is very limited.”<sup>180</sup> VZ-RI pointed out that of 400 orders examined, only 10 were seen to require jeopardy notices (2.5%) and only 4 did not receive the appropriate notice (1.0%). However, 3 of these 4 orders received an equivalent notice – albeit on a general query form rather than a query on a specific jeopardy form – from National Market Center (“NMC”) service representatives, for an overall 0.25% missing notice rate. Again VZ-RI quoted KPMG as stating, “in

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In all remaining test target cases, KPMG Consulting found that the systems or interfaces, processes, personnel, facilities, management structures, and performance measures were the same in both jurisdictions.

KPMG RI Report, p. 13.

<sup>177</sup> Verizon’s Post-Hearing Brief, p. 126.

<sup>178</sup> Id. at 126, quoting KPMG RI Report, p. 13.

<sup>179</sup> Verizon’s Post-Hearing Brief, p. 126-27, citing KPMG RI Report, p. 13.

<sup>180</sup> Verizon’s Post-Hearing Brief, p. 127, quoting Tr. 10/9/01, p. 40.

three instances where a SEM or query was sent, it did contain the same information, it was the same form, the form designator [field] was a SEM instead of an electronic jeopardy.”<sup>181</sup>

### **3. KPMG Test Conclusions**

VZ-RI summarized KPMG’s test conclusion, quoting, “[i]n totality, these results lead KPMG Consulting to believe that were we to have conducted a full-scale OSS evaluation on the magnitude of the Massachusetts test, Verizon Rhode Island would have demonstrated equivalent or superior results.”<sup>182</sup>

In addition, VZ-RI asserted that the commercial operations data provided in its Checklist Declaration and Measurements Declaration, supported by KPMG’s testing, provides the RIPUC with ample evidence to conclude that Verizon provides non-discriminatory access to its operational support systems to CLECs operating in Rhode Island, just as the Massachusetts DTE and the FCC concluded for these same OSS in Massachusetts.<sup>183</sup>

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<sup>181</sup> Verizon’s Post-Hearing Brief, p. 127, citing KPMG RI Report, pp. 29-30; Table 1-11 attached thereto; Tr. 10/9/01, p. 35.

<sup>182</sup> Verizon’s Post-Hearing Brief, p. 128, quoting KPMG RI Report, p. 13. At the hearing, KPMG’s witness also testified, “I’m extremely confident in that conclusion or I wouldn’t have put it in my report and none of my team would have let me put it in the report. We did an exhaustive test of sameness. We went into virtually every work center that is used to support both Verizon-Rhode Island and Verizon-Massachusetts. We did a careful, objective study analysis of the processes and the people... In addition, because we were really from Missouri on this, we did transaction testing that at certain levels is statistically significant on a stand alone basis for Rhode Island and the results really do speak for themselves. In most categories Verizon’s results were either statistically the same or better than the results that we received using a statistically significant sample size in Massachusetts. So I think that’s a very well formed and well founded statement and I don’t think that there’s anything in our report that contradicts that.” Tr. 10/9/01, pp. 75-76.

<sup>183</sup> Verizon’s Post-Hearing Brief, p. 128.

### C. OSS Overview

VZ-RI stated that the VZ-NE OSS and the interfaces through which CLECs obtain access to them, support interconnection arrangements, resale of VZ-NE's services, and UNEs, including the UNE-P in Rhode Island as elsewhere.<sup>184</sup>

VZ-RI maintained that the system support and assistance VZ-NE provides to CLECs in Rhode Island and elsewhere in its former Bell Atlantic service areas includes a change management process for managing the life cycle of changes that affect OSS interfaces and CLEC business practices, and carrier-to-carrier testing procedures for VZ-NE's application-to-application interfaces. In addition, VZ-RI indicated that it provides extensive documentation and training for CLECs along with a help desk, known as the Wholesale Customer Care Center ("WCCC"), that is available 24 hours a day, seven days a week.<sup>185</sup>

VZ-RI asserted that VZ-NE provides CLECs with non-discriminatory access to its OSS, allowing them to offer local service in "substantially the same time and manner" as VZ-RI. In order to comply with the Local Competition First Report and Order, VZ-RI stated that it has deployed the necessary systems and personnel to provide competing carriers in Rhode Island with non-discriminatory access to each of the necessary OSS functions, and has adequately assisted competing carriers in understanding how to implement and use all of the OSS functions available to them.<sup>186</sup>

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<sup>184</sup> *Id.* at 129. VZ-NE provides application-to-application interfaces for pre-ordering and ordering and an electronic bonding interface for maintenance and repair that enable CLECs to integrate these functions in their own systems. VZ-NE also provides a web-based Graphical User Interface for pre-ordering, ordering, and maintenance and repair functions. The interfaces through which CLECs obtain access to these OSS are consistent with industry guidelines and standards where such standards exist. Verizon RI 271 Filing – OSS Declaration, ¶ 14.

<sup>185</sup> Verizon's Post-Hearing Brief, p. 129; Verizon RI 271 Filing – OSS Declaration, ¶ 15.

<sup>186</sup> Verizon's Post-Hearing Brief, p. 129-30, citing Local Competition First Report and Order. Specifically, VZ-RI indicated that VZ-NE has developed an extensive array of systems to meet the pre-ordering,

VZ-RI acknowledged that there were a few limited complaints noted at the OSS hearings; however, VZ-RI argued that none of these even remotely approach an impairment of the CLECs' "meaningful opportunity to compete" in Rhode Island.<sup>187</sup> VZ-RI explained that the FCC has said that such isolated claims do not defeat a Section 271 applicant's proof of compliance with the Act.<sup>188</sup>

VZ-RI asserted that the record established in Rhode Island's 271 proceeding shows that VZ-RI meets the § 271 criteria established by the FCC, just as Verizon did in New York, Connecticut and Massachusetts, because VZ-NE's OSS and interfaces are demonstrating more than satisfactory performance in handling commercial volumes of CLEC transactions in Rhode Island.<sup>189</sup> For example, VZ-RI noted that during the month of August 2001, 47 competing carriers were recognized by the systems as submitting pre-order or order transactions in Rhode Island via the electronic interfaces provided by VZ-NE.<sup>190</sup> VZ-RI also asserted that it has shown over time that it is able to handle growing volumes of total commercial activity with its OSS in New York and New England (including Rhode Island). VZ-RI asserted that VZ-NE has more than met the FCC's challenge to show in Rhode Island "that OSS functions are operationally ready [with] actual commercial usage in the state for which the BOC seeks 271 authorization."<sup>191</sup>

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ordering, provisioning, maintenance and repair, and billing needs of CLECs. According to VZ-RI, the electronic interfaces provided by VZ-NE enable competing carriers to obtain access to the information and functions in its OSS in substantially the same time and manner as VZ-NE does for its own retail operations. VZ-RI noted that access to VZ-NE's OSS is provided for in Rhode Island in accordance with various interconnection agreements and through the Rhode Island Resale Tariff. *Id.*

<sup>187</sup> Verizon's Post-Hearing Brief, p. 130. VZ-RI asserted that the paucity of such complaints indicates that the issues raised are isolated and not systematic. *Id.*

<sup>188</sup> Verizon's Post-Hearing Brief, p. 130, citing New York Order, ¶¶ 50-53.

<sup>189</sup> Verizon's Post-Hearing Brief, p. 130.

<sup>190</sup> *Id.* at 130-31.

<sup>191</sup> *Id.* at 131, citing Kansas/Oklahoma Order, ¶ 104.

## **D. Pre-Order OSS**

### **1. Pre-Ordering Systems and Functionality**

With respect to the Pre-ordering function, VZ-RI asserted that the FCC has noted favorably that Verizon offers requesting carriers an industry-standard application-to-application pre-ordering interface to integrate pre-ordering and ordering functions. Verizon makes available to requesting carriers all the functionality that it provides to itself through this and other pre-ordering interfaces.<sup>192</sup> VZ-RI stated that it demonstrated that Verizon provides CLECs with the same pre-order systems and functionality in Rhode Island as it does in New York and Massachusetts. The record also shows that VZ-RI service representatives and CLEC employees obtain the same pre-ordering information from the same OSS.<sup>193</sup>

VZ-RI explained that in New York and Massachusetts, Verizon has made three electronic interfaces available: (1) a Web-based Graphical User Interface (“Web GUI”); (2) an application-to-application interface based on the industry standard Electronic Data Interchange (“EDI”) Issues 9 & 10 protocol; and (3) a second application-to-application pre-ordering interface, Common Object Request Broker Architecture (“CORBA”).<sup>194</sup> The same pre-order interfaces provide the same functionality in Rhode Island as in Massachusetts.<sup>195</sup>

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<sup>192</sup> Verizon’s Post-Hearing Brief, p. 131, citing New York Order, ¶ 128; Massachusetts Order, ¶ 50.

<sup>193</sup> Id. KPMG verified that the pre-order systems and functionality is the same in Rhode Island as in Massachusetts. Id., citing KPMG RI Report, at 24-28.

<sup>194</sup> Verizon’s Post-Hearing Brief, p. 132, citing New York Order, ¶ 132; Massachusetts Order, ¶¶ 52-53. These systems permit CLECs to perform the following pre-order functions: (1) retrieve CSRs; (2) validate addresses; (3) select telephone numbers; (4) determine services and features available to a customer; (5) obtain due date availability; (6) access loop qualification information; and (7) view a customer’s directory listings. The FCC also specifically noted that CLECs “can also check the status of pending orders.” Verizon’s Post-Hearing Brief, p. 132, citing New York Order, ¶ 132.

<sup>195</sup> Verizon’s Post-Hearing Brief, p. 132 (citations omitted). As in Massachusetts and New York, VZ-RI indicated that it offers CLECs several connectivity options for exchanging electronic transactions with Verizon using application-to-application interfaces: dial-up (asynchronous/bisynchronous), dedicated line,

## 2. Pre-Order System Performance and Volumes

VZ-RI noted that the FCC also found that Verizon had shown in Massachusetts and New York, through response times and interface availability performance data and third-party testing, that its pre-ordering interfaces and systems are operationally ready.<sup>196</sup> VZ-RI asserted that it has produced these same measurements for Rhode Island in its C2C Performance Reports.<sup>197</sup>

VZ-RI explained that with respect to system response times, the FCC supported the use of the “parity plus four seconds” standard established by the NYPSC (and used now in C2C Performance Reports for Massachusetts and Rhode Island), to prove that Verizon processes pre-order transactions for CLECs “in substantially the same time” that it processes its own pre-order transactions.<sup>198</sup> VZ-RI pointed out that although VZ-NY had missed the standard by a small margin in some circumstances, the FCC held that the slight variations in response times “are not likely to impair the ability of a competing carrier to negotiate a service order while a customer is on the line.”<sup>199</sup> VZ-RI noted that its response times are now substantially better than those earlier demonstrated in New York and are on a par with the results in Massachusetts, with results in Rhode Island consistently showing less than the 4-second differential. Further, VZ-RI asserted that excellent results have also been recorded for the Web GUI and CORBA pre-order interfaces.<sup>200</sup>

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and Internet/Public Network. CLECs decide which connectivity method to use, based upon their own criteria. Detailed specifications along with the benefits associated with each of these options are provided in Volume II of the CLEC/Resale Handbooks. VZ-RI noted that these Handbooks can be found on Verizon’s Wholesale Services Web site. *Id.*

<sup>196</sup> Verizon’s Post-Hearing Brief, p. 133, *citing* New York Order, ¶ 128; Massachusetts Order, ¶¶ 52-53.

<sup>197</sup> Verizon’s Post-Hearing Brief, p. 133.

<sup>198</sup> *Id.*, *citing* New York Order, ¶ 146; Massachusetts Order, ¶ 53.

<sup>199</sup> Verizon’s Post-Hearing Brief, p. 133, *quoting* New York Order, ¶ 147.

<sup>200</sup> Verizon’s Post-Hearing Brief, p. 133.

In addition, VZ-RI explained that the FCC also found that the “parity plus 10 seconds” standard, agreed upon in the New York collaborative process (and used in Massachusetts and Rhode Island), was an appropriate measurement for parsed CSR retrieval.<sup>201</sup> VZ-RI noted that the OSS performance for CSR retrievals has also demonstrated results for VZ-RI that is consistently better than this standard.<sup>202</sup>

VZ-RI explained that in New York and Massachusetts, the FCC found that Verizon’s interfaces in those two states were sufficiently available, based on C2C performance data.<sup>203</sup> VZ-RI asserted that it uses the same interface measures in Rhode Island that the FCC approved for Massachusetts and New York.<sup>204</sup> VZ-RI pointed out that the measurements data show that the EDI, Web GUI and CORBA interfaces were available far more than 99% of the time they were scheduled to be available during prime time for the entire period from March through August 2001.<sup>205</sup>

VZ-RI noted that the FCC found that the Verizon pre-order systems and interfaces in Massachusetts and New York are scalable to handle reasonable foreseeable demand

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<sup>201</sup> Id., citing New York Order, ¶ 152. This standard reflects the fact that, unlike other pre-ordering transactions, VZ-RI must perform the additional step of parsing CSR information into identifiable fields prior to sending the information to the CLEC. Verizon’s Post Hearing Brief, pp. 133-34.

<sup>202</sup> Verizon’s Post-Hearing Brief, p. 134.

<sup>203</sup> Verizon’s Post-Hearing Brief, p. 134, citing New York Order, ¶ 156; Massachusetts Order, at ¶ 53. VZ-RI noted that in doing so, the FCC agreed that a distinction made in the C2C measurements between prime and non-prime hours was reasonable and, further, that the changes planned to the EnView measurements used to calculate interface availability were positive. VZ-RI emphasized that the FCC found that the instances of limited unavailability reflected in these data did not deny a CLEC a meaningful opportunity to compete. VZ-MA’s pre-order interfaces “are consistently available in a manner that affords competitors a meaningful opportunity to compete.” Verizon’s Post-Hearing Brief, p. 134, citing New York Order, ¶¶ 155-56; Massachusetts Order, ¶¶ 50, 53.

<sup>204</sup> Verizon’s Post-Hearing Brief, p. 134. Further, as VZ-RI explained in its Measurements Declaration, it uses the revised EnView calculations referenced favorably in the New York Order. Verizon RI reports the availability of the interfaces provided to CLECs during both “prime time” (6:00 a.m. to 12 midnight Eastern time, Monday through Saturday) and “non-prime time” (12:01 a.m. to 5:59 a.m. Eastern time, Monday through Saturday; all day Sunday and holidays).

<sup>205</sup> Verizon’s Post-Hearing Brief, p. 134. VZ-RI asserted that the record also shows that it seeks to minimize downtime and when possible to schedule the downtime for the least frequently used time periods. Id.

volumes.<sup>206</sup> VZ-RI noted that the VZ-NE pre-order systems and interfaces are now handling over 1.6 million transactions a month with 20.2 million region-wide in 2001 and 210,000 transactions in RI.<sup>207</sup> VZ-RI asserted that the response time data addressed demonstrates VZ-NE's ability to manage capacity and to scale these systems to meet growing demand.<sup>208</sup>

Finally, with respect to the integration of pre-order and ordering systems, VZ-RI noted that the FCC found that in New York and Massachusetts, Verizon had made its pre-order and ordering OSS "readily integratable."<sup>209</sup> In approving the Massachusetts 271 application, the FCC also found that "Verizon has shown that it allows competing carriers to integrate successfully pre-ordering information into Verizon's ordering interfaces and the carriers' back office systems."<sup>210</sup> VZ-RI asserted that the same conclusion should be reached with respect to Rhode Island.

#### **E. Ordering OSS**

With respect to the OSS ordering function, VZ-RI maintained that the FCC found that Verizon provides CLECs in New York and Massachusetts with non-discriminatory access in accordance with the requirements of Section 271. According to VZ-RI, the FCC also found that Verizon's systems are able to meet reasonably foreseeable commercial volumes in the future. Finally, the FCC determined that Verizon provides

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<sup>206</sup> Verizon's Post-Hearing Brief, p. 135. VZ-RI noted that the FCC relied upon the actual volumes being handled by these systems. VZ-RI further indicated that the FCC also noted that KPMG had found that Verizon had the tested capability in place to meet future volumes and found that "its systems have sufficient capacity to meet expected future usage volumes." Id., citing New York Order, ¶ 150; Massachusetts Order, ¶ 52.

<sup>207</sup> Verizon's Post Hearing Brief, p. 135.

<sup>208</sup> Id.

<sup>209</sup> Id.

<sup>210</sup> Id., quoting Massachusetts Order, ¶ 52. VZ-RI indicated that CLECs in Rhode Island utilize the same interfaces. Moreover, in its Massachusetts test, KPMG was able to design its systems to integrate pre-

order completion notices to CLECs “in a manner that affords an efficient competitor a meaningful opportunity to compete.”<sup>211</sup>

### **1. Ordering Systems and Interfaces**

VZ-RI stated that the FCC noted that Verizon’s systems provide competing carriers with electronic access for a full range of ordering functionality.<sup>212</sup> VZ-RI explained that the ordering interfaces and gateway systems that CLECs use in Rhode Island are identical to those used in Massachusetts. In fact, according to VZ-RI, the underlying OSS are the same throughout New England.<sup>213</sup> During May 2001, thirteen carriers used EDI in Rhode Island to submit Local Service Reports (“LSRs”). As of the end of May 2001, there were nineteen CLECs certified to use EDI and two more in the certification process. As of the end of August 2001, the number of carriers certified to use EDI in Rhode Island had grown to 30, with one other carrier in progress. In August, as in May 2001, over 30 CLECs used the Web GUI to submit LSRs in Rhode Island.<sup>214</sup>

VZ-RI indicated that it currently offers two industry standard versions of the Local Service Order Guidelines (“LSOG”) for each of the ordering interfaces. The first is LSOG 4, which is associated with EDI Issue 10/ELMS 4 and was in place when the FCC approved the Massachusetts 271 application. The second (LSOG 5) is an updated version of the interface, which is associated with EDI issue 11/ELMS 5. LSOG 5 was introduced on October 22, 2001, in accordance with industry standards and the VZ-NE OSS Change Management Process. VZ-RI indicated that it would continue to support

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ordering and ordering functions. VZ-RI asserted that those results apply equally to Rhode Island. *Id.* (citations omitted).

<sup>211</sup> Verizon’s Post-Hearing Brief, p. 136, quoting New York Order, ¶ 187, Massachusetts Order, ¶ 83.

<sup>212</sup> Verizon’s Post-Hearing Brief, p. 136, citing New York Order, ¶ 159, Massachusetts Order, ¶ 70.

LSOG 2 orders in the pipeline for 30 days. VZ-RI stated that its support for CLECs in Rhode Island has enabled all 39 of them to make the transition to LSOG 4 on a schedule that was convenient for them within a reasonable time. These systems allow CLECs to order both UNEs – including combinations of UNEs such as UNE-P – and resold services. According to VZ-RI, these ordering systems continue to support growing volumes of CLEC order activity, amounting to over 4.6 million LSRs in New York/New England in 2001 through the month of August.<sup>215</sup>

## **2. Order Flow-Through/Order Rejects**

According to VZ-RI, the vast majority of resale and UNE LSRs are submitted electronically through the EDI and Web GUI interfaces. Many of these LSRs are designed to flow-through VZ-NE's interface and gateway systems to the Service Order Processor ("SOP") without manual intervention, and continue automatically into the provisioning systems.<sup>216</sup>

VZ-RI explained that there are various types of orders that are designed to flow-through. VZ-RI also noted that there are several reasons why LSRs might not pass these edits and therefore would not flow-through. In some cases, the order scenario or specific

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<sup>213</sup> Verizon's Post-Hearing Brief, p. 136. VZ-RI stated that as in Massachusetts, CLECs in Rhode Island have a choice of two interfaces for submitting resale and UNE LSRs (including LSRs for DSL loops and line sharing) – EDI and the Web GUI. *Id.*

<sup>214</sup> Verizon's Post-Hearing Brief, p. 136.

<sup>215</sup> *Id.* at 136-37. In addition, for ordering certain arrangements like interconnection trunks that resemble access-type services, VZ-RI indicated that, like VZ-NY and VZ-MA, it provides Connect:Direct (formerly called Network Data Mover or NDM). Connect:Direct is a well-established industry standard protocol for exchanging information within and between telecommunications carriers, and has traditionally been used by Verizon to receive access service requests from interexchange carriers. CLECs may order interconnection trunks and other access-type services by submitting an access service request ("ASR") over Connect:Direct, using the Web-based Carrier Services Gateway ("CSG") system, (which is also provided to IXCs), or by faxing their orders. *Id.* at 137.

<sup>216</sup> Verizon's Post-Hearing Brief, p. 137, "Flow-through" is defined as the process where an LSR submitted through the EDI or Web GUI interface is routed first to the gateway systems and then to the SOP where it is confirmed, without the assistance of a human representative in the NMC. *Id.* at 137-38 (citations omitted).

product on the LSR may not be designed to flow-through. In other situations, LSRs may be submitted with incorrect information as defined by the business rules. In still other cases, the data to be derived for use in the back-end OSS may not be accessible or available, or the information provided on the LSR may not match the data in the back-end OSS. When the request does not pass these edits, the LSR is either queried back to the CLEC or it is sent to the NMC for manual processing.<sup>217</sup>

VZ-RI stated that orders requiring manual handling by the NMC are automatically directed by the system to the appropriate work group based on order type. There, the NMC representative processes any orders that are not designed to flow-through or that fail to flow-through as the result of an error. VZ-RI noted that, an important aspect was that the NMC representative also reviews those orders and, if a discrepancy is uncovered that requires input from the CLEC, the representative sends a query to the CLEC for clarification.<sup>218</sup>

VZ-RI noted that the FCC has stated that “it would be inappropriate to consider order flow-through rates as the sole indicia of parity.”<sup>219</sup> VZ-RI maintained that the FCC indicated that Verizon’s ability to return timely order confirmation notices, to accurately process manual orders, and to scale its systems was more relevant and probative to the FCC’s analysis than a simple flow-through analysis.<sup>220</sup> VZ-RI also pointed out that its total flow through performance (OR5-01) for both Resale and UNE orders for the period

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<sup>217</sup> Verizon’s Post-Hearing Brief, p. 138.

<sup>218</sup> Id. at 138.

<sup>219</sup> Id., quoting New York Order, ¶ 161.

<sup>220</sup> Verizon’s Post-Hearing Brief, pp. 138-39, citing New York Order, ¶ 163; Massachusetts Order, ¶ 81.

preceding VZ-RI's 271 filing was made exceeds the levels reached in Massachusetts when the 271 review process was completed in that state.<sup>221</sup>

VZ-RI stated that one of the factors that is important in achieving high order flow-through levels, and low order "fallout" levels (to manual processing) and/or infrequent order rejection, is the care with which CLECs prepare their orders. VZ-RI noted that although some Resellers have been able to achieve high flow-through rates and low rates of order rejection, others have experienced far poorer results. VZ-RI further noted that similar variations in order reject rates results also prevail with respect to UNE providers.<sup>222</sup> VZ-RI emphasized that the FCC found that the observed variations in individual CLEC experiences in their respective flow-through/reject rate success level indicate that Verizon cannot be held solely responsible for the results.<sup>223</sup>

In its effort to increase the number of the LSRs that flow-through the systems, VZ-RI pointed out that it analyzes LSRs that do not flow-through to identify and determine whether CLEC education or system enhancements are appropriate. VZ-RI also stated that in order to assist CLECs in performing their own analyses of the causes that prevent their LSRs from flowing through, VZ-RI will create a report of flow-through errors by individual CLEC and by mode-of-entry.<sup>224</sup>

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<sup>221</sup> Verizon's Post-Hearing Brief, p. 139.

<sup>222</sup> Id.

<sup>223</sup> Id., citing New York Order, ¶ 175, asserting that the FCC's conclusion in New York that Bell Atlantic's [Verizon's] evidence that order rejection rates vary from 3 percent to greater than 70 percent "strongly implies that the care a competing carrier takes in submitting its orders makes a significant difference in the rate at which its orders are rejected." See e.g., New York Order, ¶ 175.

<sup>224</sup> Verizon's Post-Hearing Brief, pp. 139-40. This information is made available to CLECs requesting it through Change Management. Id. at 140.

### 3. Ordering Processing and Status Notices

VZ-RI noted that the FCC has determined that the timely provision of order confirmation notices was an important element in evaluating a § 271 Application.<sup>225</sup> VZ-RI explained that its ordering OSS is designed to provide either a Local Service Request Confirmation (“LSRC”) or a Local Service Request Rejection (rejection notice) once an order is received, in the same manner as in New York and Massachusetts. According to VZ-RI, these notices are returned to the CLEC over the same interface the CLEC used to submit the LSR, irrespective of whether they were generated by either the mechanized or manual processing of the order itself.<sup>226</sup> VZ-RI asserted that Verizon’s performance for timely order processing was previously subject to the standards established for mechanized and manually processed order confirmation and rejection notices in the New York C2C guidelines – now adopted in both Massachusetts and Rhode Island. The FCC stated that these standards provide “a reasonable measure of whether Bell Atlantic [Verizon] processes an order in a manner that provides an efficient competing carrier with a meaningful opportunity to compete.”<sup>227</sup>

VZ-RI asserted that in assessing Verizon’s performance in New York, the FCC found that “[it] generally meets these standards, and where Bell Atlantic [Verizon] has fallen short of the standards, the shortfall has not been significant.”<sup>228</sup> VZ-RI asserted that the same holds true for Rhode Island. Indeed, according to VZ-RI, the C2C

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<sup>225</sup> Verizon’s Post-Hearing Brief, p. 140, citing New York Order, ¶ 159, Massachusetts Order, ¶¶ 71, 74.

<sup>226</sup> Verizon’s Post-Hearing Brief, p. 140.

<sup>227</sup> Id. at 141, quoting New York Order, ¶ 60.

<sup>228</sup> Verizon’s Post-Hearing Brief, p. 141, quoting New York Order, ¶¶ 160, 164-165 (UNEs), 180 (Resale); see also Massachusetts Order, ¶¶ 71, 74.

performance measurements show that VZ-RI has been providing LSRCs and rejection notices, as appropriate, on a timely basis.<sup>229</sup>

In addition, VZ-RI indicated that it reports several measures to track status notifiers that are based on some of the measures originally developed in a March 9, 2000 Consent Decree between the FCC and Verizon. These metrics measure Verizon's timeliness and "completeness" in returning acknowledgements to CLECs (OR-8-01 and OR-9-01) and its "completeness" in returning confirmations or reject notices to CLECs (OR-7-01). According to VZ-RI, its performance on all of these measures from March through August 2001 has also consistently met or bettered the established standard in Rhode Island.<sup>230</sup>

VZ-RI also stated, that like Verizon in New York and Massachusetts, VZ-RI measures the accuracy of its order processes in several ways. VZ-RI asserted that a review of these measures in New York and Massachusetts demonstrated to the FCC that it processes orders accurately in both of those states.<sup>231</sup> According to VZ-RI, Verizon also processes orders accurately in Rhode Island.<sup>232</sup> VZ-RI explained that the C2C Performance Reports contain three measures of the accuracy with which orders requiring manual intervention from Verizon are processed: Percent Accuracy-Orders; Percent Accuracy-Opportunities; and Percent Accuracy-LSRC. VZ-RI indicated that it exceeded the 95% benchmark for the Opportunities measure in Rhode Island throughout the period March to August 2001 each and every month for Resale, for UNE-P, and for UNE-Loop. Similarly, VZ-RI's reported results for Percent Accuracy - LSRC for the same period

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<sup>229</sup> Verizon's Post-Hearing Brief, p. 141.

<sup>230</sup> *Id.*

<sup>231</sup> *Id.* at 142, citing New York Order, ¶¶ 171-72, Massachusetts Order, ¶ 81.

<sup>232</sup> Verizon's Post-Hearing Brief, p. 142.

generally exceeded 95% for Resale, for UNE-P and for UNE Loop, and frequently registered 97% or 98%. VZ-RI admitted that the results for the Percent Accuracy - Orders metric were below the objective levels. However, VZ-RI noted, this metric measures “mismatches” between the last version of the LSR submitted by the CLEC and the service orders entered into VZ-NE’s service order processor, rather than service-affecting errors.<sup>233</sup>

VZ-RI pointed out that the FCC previously took note of consistently strong installation quality results demonstrated by Verizon to show that CLEC orders were being processed accurately.<sup>234</sup> VZ-RI asserted that the accuracy of NMC representative performance is also reflected in VZ-NE’s actual performance in the installation quality measures in Rhode Island. According to VZ-RI, it tracks troubles reported within 7 or 30 days of installation in Rhode Island.<sup>235</sup> VZ-RI maintained that on these measures, Verizon has demonstrated excellent C2C results in Rhode Island for Resale-POTS and UNE-POTS orders that are usually better than, and at least comparable to, its accuracy on orders for retail customers.<sup>236</sup>

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<sup>233</sup> *Id.* at 142-43. VZ-RI indicated that in some cases, a mismatch will have no effect on the service provided to the CLEC. Adjusting the C2C results for such “mismatches” produces a Resale results generally at or above 90% and UNE-P results at or above 93%. And, even without this adjustment, VZ-RI’s reported UNE Loop performance for the Percent Accuracy – Orders measurement, the predominant form of order in Rhode Island, has met or exceeded target for each month from March through August 2001. VZ-RI emphasized that with respect to the “Service Order accuracy” measure, the FCC reported that Verizon had acknowledged that its implementation of this measurement has been problematic. New York Order, at ¶¶ 173-174.

<sup>234</sup> Verizon’s Post-Hearing Brief, p. 143, citing New York Order, ¶ 174, 183.

<sup>235</sup> Verizon’s Post-Hearing Brief, p. 143. This measures both service order accuracy – since an end user will report a trouble if a service ordered is not installed or is not installed correctly – and provisioning quality – since an end user will report a trouble if a newly installed service is not working properly. *Id.*, citing New York Order, ¶ 174.

<sup>236</sup> Verizon’s Post-Hearing Brief, p. 143.

#### 4. Jeopardy and Completion Notices

Jeopardy Notices. VZ-RI indicated that the FCC has found that Verizon provides access to its order status and jeopardy information in a non-discriminatory manner in New York and Massachusetts.<sup>237</sup> VZ-RI maintained that the process VZ-NE uses to inform CLECs of orders that are in jeopardy in Rhode Island is the same as the process used in Massachusetts and approved by the FCC. As in New York and Massachusetts, Verizon provides CLECs with electronic access to Open Query System (“OQS”) reports which are generated by the Work Force Administration (“WFA”) system for both provisioning and maintenance, to notify CLECs that an order (or maintenance) appointment may be in jeopardy in Rhode Island.<sup>238</sup>

VZ-RI asserted that based on the OQS process, the FCC concluded that Verizon makes order status and jeopardy information available to CLECs in a non-discriminatory manner in both New York and Massachusetts.<sup>239</sup> VZ-RI asserted that the systems and processes for providing this information in Rhode Island are identical.<sup>240</sup>

VZ-RI pointed out that in the New York Order, the FCC specifically rejected the CLEC argument that Verizon’s OQS system was discriminatory because it did not “actively provide electronic jeopardy notices...” stating that “we do not require Bell Atlantic to establish a system for creating and delivering jeopardy notifications to

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<sup>237</sup> Id., citing New York Order, ¶158, Massachusetts Order, ¶ 83.

<sup>238</sup> Verizon’s Post-Hearing Brief, p. 143. VZ-NE posts OQS reports three times each day. VZ-NE retains the reports for approximately 30 days so that CLECs can check on earlier reports, if desired. The OQS reports VZ-NE provides to CLECs were agreed to in negotiations during collaborative proceedings in New York. Verizon now provides the same reports throughout the former Bell Atlantic footprint. Id. at 143-44.

<sup>239</sup> Verizon’s Post-Hearing Brief, p. 145, citing New York Order, ¶ 184 “[w]e conclude that the order status and jeopardy information system created by Bell Atlantic [VZ-NY] for wholesale orders is non-discriminatory because it allows competing carriers to access order status and “jeopardy” information, to the extent that it is available, in substantially the same time and manner as Bell Atlantic’s retail operations can access such information.” New York Order, ¶ 184.

<sup>240</sup> Verizon’s Post-Hearing Brief, p. 145.

competing carriers that is superior to the system Bell Atlantic has for its own retail representatives or customers.”<sup>241</sup>

VZ-RI noted that KPMG’s stand-alone test of VZ-NE’s Electronic Jeopardy process in Rhode Island (POP 1-17-1, -2, -3) was conducted in two parts. In the first part, KPMG submitted 25 orders, of which 22 were provisioned on the due date. Of the 3 orders that were not provisioned on the due date, KPMG reported that Verizon issued jeopardy notices in all three cases. In the second part, KPMG analyzed over 400 production orders in Rhode Island. Out of this group, 96 orders required detailed examination as potential jeopardy situations. Because Verizon provisioned nearly 99% of the orders examined on the confirmed due date, there were an insufficient number of cases remaining in which a jeopardy notice would have been expected for KPMG to draw a conclusion. However, as noted in the discussions of KPMG testing, only 2.5% of the 400 orders required a jeopardy notice and only 0.25% (1 order) did not receive jeopardy status information. VZ-RI noted that KPMG indicated that this clearly was not a critical OSS failure.<sup>242</sup>

Completion Notifiers. The FCC also concluded that in New York and Massachusetts Verizon provided order completion notification “in a manner that affords an efficient competitor a meaningful opportunity to compete.”<sup>243</sup> Specifically, it observed that in New York and Massachusetts Verizon provided both a “billing completion” and a “work completion” notice to CLECs. The FCC found that these

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<sup>241</sup> Id., quoting New York Order, ¶ 184; See Massachusetts Order, at ¶ 85. Nevertheless, VZ-RI stated that in order to further assist its CLEC customers, Verizon made available an Electronic Jeopardy Notification through the EDI and Web GUI interfaces in October 2000. Verizon’s Post-Hearing Brief, p. 145.

<sup>242</sup> Verizon’s Post-Hearing Brief, pp. 145-46, citing KPMG RI Report. “I believe that Verizon’s on time provisioning performance in the study was 98.9% and as a consequence when you’re provisioning accuracy and timeliness [sic], very high electronic jeopardies are far less critical.” Tr. 10/9/01, p. 30.

<sup>243</sup> Verizon’s Post-Hearing Brief, p. 146 (citations omitted).

notices were being timely provided based upon the C2C performance data and on the results of the KPMG review.<sup>244</sup>

VZ-RI maintained that the process VZ-RI uses to provide Rhode Island CLECs with completion notifiers is the same as the process used in Massachusetts and New York and approved by the FCC.<sup>245</sup> VZ-RI asserted that the performance data provided by VZ-RI similarly show that the completion notices are being timely provided to CLECs. The C2C Performance Guidelines establish a standard of 95% of both provisioning and billing completion notices returned by noon of the next business day after SOP is updated (for provisioning notices) or after the billing records are updated (for billing notices). VZ-RI noted that the C2C reports show that it routinely exceeds this standard for provisioning completion notices and billing completion notices.<sup>246</sup>

#### **F. Provisioning OSS**

VZ-RI noted that in its review of Verizon's OSS in Massachusetts and New York, the FCC noted that Verizon's systems are set up to provide parity of service for provisioning wholesale and retail orders.<sup>247</sup> The same systems are in use by Verizon in Rhode Island as in Massachusetts.<sup>248</sup>

VZ-RI indicated that KPMG previously evaluated the methods and procedures, processes, and systems used by VZ-MA to provision both retail and wholesale orders.

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<sup>244</sup> Id., citing New York Order, ¶¶ 187, 190; Massachusetts Order at ¶¶ 83-4.

<sup>245</sup> Verizon's Post-Hearing Brief, p. 146.

<sup>246</sup> Id.

<sup>247</sup> Id. at 148 citing New York Order, ¶¶ 193, 197; Massachusetts Order, at ¶ 90.

<sup>248</sup> Verizon's Post-Hearing Brief, p. 148 (citations omitted). For most orders from CLECs (all resale, platform, and new UNE loop orders), the provisioning systems and processes employed by VZ-RI are the same as are used for Verizon retail provisioning. For UNE-loop conversions ("hot cuts"), which involve physically disconnecting an end user's loop from the Verizon switch and connecting it to the CLEC's transmission equipment, Verizon coordinates its provisioning activity with the CLEC to minimize the disruption of the customer's service. However, the same provisioning systems used for other orders support the process. Id., citing KPMG RI Report, pp. 79-90.